

APR 23 2013

UNITED STATES OF AMERICA

v.

Criminal No. 1:13-MJ-237

TO REMAIN SEALED UNTIL
THE RETURN OF THE EXECUTED
ARREST WARRANT

Defendant.

I, Jeffrey F. Johannes, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, Washington Field Office, Northern Virginia Resident Agency. I have been a Special Agent since January 2003. I am assigned to investigations relating to, among other things, crimes against children, including the sex trafficking and prostitution of children. I have participated in numerous investigations involving the sex trafficking and prostitution of children.

2. This affidavit is submitted in support of a criminal complaint and arrest warrant charging that between in and around June 2012 and on or about December 11, 2012, in Fairfax County and elsewhere, in the Eastern District of Virginia and elsewhere, the defendant, QUINTAVIS DEONTE DUMAS, also known as “Tay,” aided and abetted by others, did knowingly recruit, entice, harbor, transport, provide, and obtain a girl, Jane Doe #1, who had not attained the age of 18 years, in and affecting interstate commerce, knowing and in reckless disregard of the fact that this girl, Jane Doe #1, had not yet attained the age of 18 years, and the

defendant knowingly caused Jane Doe #1 to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and 2.

3. This affidavit contains information necessary to support a finding of probable cause and is based on my personal observations during the course of this investigation, information conveyed to me by other law enforcement officials, and my review of records, documents, and other physical evidence obtained during this investigation. This affidavit does not include each and every fact observed by me or known to the government.

II. THE DEFENDANT

4. QUINTAVIS DUMAS is from Georgia and has lived in various places in Georgia, including the areas in and around Atlanta.

5. I have reviewed QUINTAVIS DUMAS's criminal history, which shows that QUINTAVIS DUMAS was convicted of Possession of Marijuana in February of 2010 in College Park, Georgia.

III. PROBABLE CAUSE

A. Discovery of the Sex Trafficking Enterprise During a Prostitution Sting

6. On or about December 11, 2012, Fairfax County Police officers discovered an advertisement posted on Backpage.com under the "Escorts" section. They responded to the advertisement by calling the posted telephone number. A female answered the telephone, and an undercover detective and the female agreed that the detective would pay \$250 for services from two females. Among other things, the female asked if the detective was a law enforcement officer, which the detective denied. Someone then texted the detective the address to which he was supposed to go to meet the two females. The address corresponded to that of the Hyatt House hotel, 467 Herndon Parkway, Herndon, Virginia, within the Eastern District of

Virginia.

7. Once at the Hyatt House hotel, the undercover detective called the telephone number and was eventually instructed to go to Room 214. The detective went to Room 214, knocked on the door, and the door was answered by a 17 year old girl, Jane Doe #2. Jane Doe #2 invited the undercover detective to enter the room, and the detective observed that Room 214 was a two-bedroom suite. Inside the suite, the undercover officer saw four females, including Jane Doe #2. Jane Doe #2 then led the undercover detective into a bedroom where they were joined by Jane Doe #1.

8. Once inside the bedroom, Jane Does #1 and #2 both asked the undercover detective if he was a law enforcement officer, and the detective again denied that he was a police officer. Jane Doe #2 then told the undercover detective that the price was \$250 but that if he wanted any "fetishes," there would be an extra charge. The undercover detective responded that he wanted Jane Doe #1 to perform oral sex on him and that he wanted to have vaginal sex with Jane Doe #2. The girls responded that "head" was a "fetish" and would cost extra. The undercover detective agreed to pay extra and the girls agreed that Jane Doe #1 would perform oral sex on the detective while Jane Doe #2 would submit to vaginal sex with him. Both girls then undressed and began looking for a condom.

9. When the girls could not find a condom, Jane Doe #1 opened the bedroom door and inquired of the other people in the suite if they had a condom. Jane Doe #3 entered the room wearing only a bra and began looking around the room for condoms; she eventually found two Durex brand condoms, which she handed to one of the other girls, who then handed the condoms to the undercover detective. Jane Doe #1 instructed the undercover officer to put on the condom so that they could get started.

10. A short time later, Jane Doe #3 came into the room and asked the undercover detective if he was a police officer because the police were knocking on the door. The undercover detective again denied that he was law enforcement officer. Jane Doe #3 instructed the undercover detective to act as though he were Jane Doe #1's boyfriend. Jane Doe #3 also instructed Jane Doe #2 to hide the money that the undercover detective had earlier provided to her. Jane Doe #3 exited the bedroom, but shortly thereafter she returned and asked Jane Doe #1 whether Jane Doe #1 had performed oral sex on the detective. When Jane Doe #1 responded that she had not, Jane Doe #3 ordered Jane Doe #1 to do so. At that point, the detective ordered Jane Doe #1 to stay back. Jane Doe #3 then yelled: "Yo, he is a cop!" The detective then opened the door to the suite so that the arrest team could enter.

11. The arrest team found five females in the suite, Jane Doe #1 through Jane Doe #5:
- a. Jane Doe #1 was 17 years old;
 - b. Jane Doe #2 was 17 years old;
 - c. Jane Doe #3 was 17 years old; when searched later that night, police found \$1,500 in her underwear;
 - d. Jane Doe #4 was 17 years old; and
 - e. Jane Doe #5 was 19 years old.

B. Brief Interview of Coconspirator Joshua Jacquis Dumas

12. On or about December 11, 2012, shortly after the arrest team entered the suite at the Hyatt House hotel, Fairfax County Police officers encountered a man from Georgia, Joshua Jacquis Dumas ("Joshua Dumas"), in a hallway on the second floor of the hotel.¹ Joshua Dumas agreed to speak with a detective and, although Joshua Dumas was not in custody, he was

¹ The undercover detective saw Dumas exit Room 214 as the detective approached the room.

advised of his *Miranda* rights. Initially, Joshua Dumas denied that he knew of or had any involvement with any of the Jane Does listed above. Joshua Dumas falsely claimed that he was staying on another floor and was merely out for a walk. However, when the police escorted Jane Doe #1 past Joshua Dumas, Jane Doe #1 falsely claimed that Joshua Dumas was her brother. Joshua Dumas then changed his story and falsely claimed that Jane Doe #1 was indeed his sister. Joshua Dumas admitted that, a few days before, he brought Jane Doe #1 and another female from Georgia to Virginia.

13. Officers arrested Joshua Dumas and charged him with: (1) Aiding Prostitution or Illicit Sexual Intercourse, in violation of Section 18.2-348 of the Code of Virginia; (2) Keeping, Residing in, or Frequenting a Bawdy Place, in violation of Section 18.2-347 of the Code of Virginia; and (3) Contributing to the Delinquency of a Minor, in violation of Section 18.2-371 of the Code of Virginia. In a search of Joshua Dumas, officers recovered, among other things, two cellular telephones, eight condoms, and \$520 in cash.

14. On or about January 11, 2013, Joshua Dumas was arrested on a Criminal Complaint charging him with Sex Trafficking of a Minor, in violation of Title 18, United States Code, Section 1591(a). *See United States v. Joshua Jacquis Dumas*, No. 1:12-MJ-819-TRJ. On or about March 18, 2013, Joshua Dumas pleaded guilty to Engaging in a Child Exploitation Enterprise, in violation of Title 18, United States Code, Sections 1591(a) and 2252A(g). *See United States v. Joshua Jacquis Dumas*, No. 1:13-CR-94-LMB.

C. Interview of Jane Doe #1

15. On or about December 15, 2012, I participated in an interview of Jane Doe #1.²

² Jane Doe #1 was charged with prostitution, in violation of Section 18.2-346 of the Code of Virginia. This charge was later dismissed by the Office of the Commonwealth's Attorney for

Jane Doe #1 was represented by an attorney, and the interview was conducted pursuant to a proffer agreement with the United States Attorney's Office. During the interview, Jane Doe #1 initially lied to protect Joshua Dumas. For example, initially Jane Doe #1 denied that Joshua Dumas was a pimp, but later, she admitted that Joshua Dumas is a pimp and that she was prostituting for Joshua Dumas and Edwin Barcus. When asked about her motivation for lying, Jane Doe #1 stated that she had loved Joshua Dumas and feared that Barcus and others would harm her if they found out that she had cooperated with law enforcement agents.

16. During the interview, among other things, Jane Doe #1 stated:

- a. she was born in 1995;
- b. she is originally from Georgia;
- c. in Georgia, in 2012, she was approached by Barcus, who yelled at her in an attempt to coerce Jane Doe #1 to prostitute for him, which caused Jane Doe #1 to cry;
- d. Barcus introduced Jane Doe #1 to Joshua Dumas, and Joshua Dumas comforted Jane Doe #1;
- e. Joshua Dumas expressed a romantic interest in and affection for Jane Doe #1; the two began to "date," and later, Jane Doe #1 considered Joshua Dumas to be her boyfriend;³
- f. Joshua Dumas revealed to Jane Doe #1 that he was a pimp; Jane Doe #1 saw a girl who worked for Joshua Dumas give Joshua Dumas money that Jane Doe #1 believed was the proceeds of prostitution;
- g. later, Joshua Dumas informed Jane Doe #1 that he could not get a job and that he needed Jane Doe #1 to make money for him by working as a prostitute;

Fairfax County, Virginia.

³ I know from my training and experience that this is a technique that pimps sometimes use to lure impressionable girls into prostitution.

- h. although Jane Doe #1 initially rejected Joshua Dumas's requests, because Joshua Dumas claimed that he loved her, Jane Doe #1 agreed to engage in sex acts with customers in exchange for money;
- i. prior to prostituting Jane Doe #1, Joshua Dumas had sexual intercourse with Jane Doe #1; a short time after they began having sexual relations, Joshua Dumas asked Jane Doe #1 to prostitute for him;⁴
- j. Joshua Dumas initially prostituted Jane Doe #1 in various locations in Georgia, including around Savannah, Georgia;
- k. when prostituting Jane Doe #1, someone would post an advertisement on Backpage.com and they would wait for customers to call in response to the advertisement;
- l. Jane Doe #1 and other girls being prostituted received marijuana and alcohol in order to "relax" them;
- m. at times, Jane Doe #1 was instructed to charge \$80 for 15 minutes of sex; \$100 for a half-hour of sex; and \$200 for a full hour of sex;
- n. Joshua Dumas knew Jane Doe #1's age because she told him her age;
- o. Barcus also had sexual relations with Jane Doe #1;
- p. Jane Doe #1 gave Joshua Dumas the prostitution proceeds she earned;
- q. Joshua Dumas, among others, instructed Jane Doe #1 not to mention him if she was ever encountered by the police;
- r. Joshua Dumas began prostituting Jane Doe #1 while she was 16 years old and continued after she turned 17 years old;
- s. around August 2012, when Jane Doe #1 expressed that she missed a relative and wanted to leave, Joshua Dumas struck Jane Doe #1 in the face; when Jane Doe #1 cried, Joshua

⁴ I know from my training and experience that pimps sometimes "groom" girls for prostitution by first having sex with them.

Dumas told her to “shut up” and yelled at her to stop crying; around the next day, Joshua Dumas mentioned that he was leaving to get a gun, and Jane Doe #1 feared that Joshua Dumas would use the gun on her;

- t. after she left Joshua Dumas in and around October 2012, Barcus and QUINTAVIS DUMAS picked up Jane Doe #1 in Tennessee and she was subsequently prostituted in Florida;
- u. Joshua Dumas continued to call Jane Doe #1, told her that he loved and missed her, and convinced Jane Doe #1 to return to him;
- v. Joshua Dumas then prostituted Jane Doe #1 in the Atlanta, Georgia area;
- w. Joshua Dumas learned that Barcus and QUINTAVIS DUMAS were making good money in Herndon, Virginia and decided that they should go to Herndon, Virginia for prostitution; and
- x. once in Herndon, Virginia, Jane Does #1 and #2, among others, engaged in sex acts for money; for example, one night Jane Does #1 and #2 performed sex acts with a man who paid about \$720, which was given to Joshua Dumas.⁵

17. On January 9, 2013, I interviewed Jane Doe #1 a second time at the United States

Attorney’s Office. Jane Doe #1 advised of the following:

- a. she met Barcus, whom she knew as “Boo,” around May 2012 in Savannah, Georgia;
- b. she met Barcus through a friend from school who already knew Barcus;
- c. Barcus was in the company of two other females, as well as QUINTAVIS DUMAS, and Jane Doe #1 learned around this time that Barcus ran a prostitution business;
- d. various females provided Barcus with money;

⁵ Jane Doe #1 identified photographs of Jane Doe #2 through and including Jane Doe #5 and stated that these individuals also engaged in prostitution.

- e. Barcus facilitated prostitution activities at the Guest House hotel in Savannah, Georgia;
- f. an adult worked for Barcus at the Guest House hotel;
- g. QUINTAVIS DUMAS pimped a woman and then gave the money to Barcus;
- h. it was around this time that she met Joshua Dumas, who was an associate of Barcus;
- i. Barcus periodically rented a suite at the Guest House hotel, and Barcus, Joshua Dumas, QUINTAVIS DUMAS, Jane Doe #1, and others stayed in this suite;
- j. for several weekends in late May and June 2012, and sometimes in July 2012, she spent time with Barcus and Joshua Dumas at the Guest House hotel;
- k. around this time, while at the Guest House hotel, Barcus had sexual relations with her;
- l. she was 16 years old, and both Barcus and Joshua Dumas were aware of Jane Doe #1's age because she told them her age;
- m. Barcus was the "boss" of the prostitution organization and Joshua Dumas and QUINTAVIS DUMAS worked for Barcus;
- n. after Joshua Dumas convinced her to work as a prostitute, Jane Doe #1 worked directly for Barcus;
- o. she first engaged in prostitution for Barcus in early July 2012 at the La Quinta hotel near Savannah, Georgia;
- p. Barcus informed her of "the Rules" of prostitution, which included: ask customers if they are law enforcement; never discuss sexual activities over the phone; obtain the money up front from customers; feel the customer's penis before engaging in sex acts; do not look at another male who was not a customer; do not mention that she has a pimp; and, if arrested or stopped by the police, do not mention anything about prostitution;

- q. Barcus, Joshua Dumas, and QUINTAVIS DUMAS often referred to the prostitution business as “the game;”⁶
- r. Barcus told her the fees to charge: \$80 for 15 minutes of sex (known as a “quickie”), \$100 for 30 minutes of sex, and \$200 for one hour of sex;
- s. Barcus provided her with Trojan and Durex brand condoms to use in prostitution;
- t. while being prostituted at the Guest House hotel, Barcus, Joshua Dumas, and QUINTAVIS DUMAS provided her with marijuana and alcohol;
- u. in the Savannah, Georgia area, Barcus posted an advertisement on the website Backpage.com which advertised Jane Doe #1’s availability to customers;
- v. when the first male customer responded to Jane Doe #1’s Backpage.com advertisement, an adult female working for Barcus answered the telephone and negotiated with the customer for the customer to have sex with Jane Doe #1;
- w. this customer had vaginal sex with Jane Doe #1 for approximately \$80, which Jane Doe #1 gave to Barcus;
- x. she cried after servicing this customer, to which Barcus simply responded: “thank you;”
- y. Joshua Dumas informed Jane Doe #1 that Barcus is “the brains” of the prostitution business and that Joshua Dumas’s role was to recruit girls to be prostitutes;
- z. QUINTAVIS DUMAS carried a firearm to provide protection to members of the enterprise;
- aa. in November 2012, Jane Doe #1 again worked for Barcus and was joined by Jane Doe #3 and an adult female; around this time, Jane Doe #1 made approximately \$500 while engaging in prostitution activities, and she gave this money directly to Barcus;

⁶ I know from my training and experience that pimps often refer to prostitution as “the game.”

- bb. Barcus and Joshua Dumas sometimes gave Jane Doe #1 some of the prostitution proceeds to purchase clothes or for other expenses;
- cc. in early December 2012, Joshua Dumas brought Jane Does #1 and #2 from Atlanta, Georgia to Richmond, Virginia, via a Greyhound bus;
- dd. at a bus station in Virginia, Barcus and QUINTAVIS DUMAS picked up Joshua Dumas, and Jane Does #1 and #3, and transported them to the Hyatt House hotel in Herndon, Virginia where Barcus and QUINTAVIS DUMAS were already engaged in prostitution activities; and
- ee. she believes that Barcus paid for the Greyhound bus tickets for Joshua Dumas, and Jane Does #1 and #2.

18. Jane Doe #1 stated that initially she was not forthcoming about “Boo” because she is afraid of him. She believes that “Boo” is violent and she feared that he would harm her. She also knew “Boo” could get a firearm from QUINTAVIS DUMAS at any time.

19. Jane Doe #1 positively identified a photograph of QUINTAVIS DUMAS, as the person she knows as “Tay.”

D. Interview of Jane Doe #2

20. On or about December 18, 2012, I participated in an interview of Jane Doe #2.⁷ During the interview, Jane Doe #2 was represented by an attorney, and the interview was conducted pursuant to a proffer agreement with the United States Attorney’s Office.

21. During the interview, among other things, Jane Doe #2 stated:

- a. she is 17 years old and is originally from Georgia;
- b. around November 2012, she met Barcus and Joshua Dumas

⁷ Jane Doe #2 was charged with prostitution, in violation of Section 18.2-346 of the Code of Virginia. This charge was later dismissed by the Office of the Commonwealth’s Attorney for Fairfax County, Virginia.

through Jane Doe #1;

- c. initially, Jane Doe #2 was unaware that Barcus and Joshua Dumas were involved in prostitution, but then Joshua Dumas told Jane Doe #2 about a “fun way” to earn money: prostitution;
- d. Jane Doe #2 agreed to work as a prostitute, and Barcus and Joshua Dumas became her pimps;
- e. at some point, Jane Doe #2 informed Barcus and Joshua Dumas that she was only 17 years old;
- f. Joshua Dumas attempted to prostitute Jane Doe #2 in Atlanta, Georgia by posting advertisements on Backpage.com, but they were unsuccessful in finding customers;
- g. in Georgia, another pimp offered to purchase Jane Doe #2 from Joshua Dumas so that the other pimp could prostitute Jane Doe #2;
- h. in early December 2012, Joshua Dumas stated that he wanted to take Jane Does #1 and #2 to Virginia to meet up with Barcus to engage in prostitution activities;
- i. Jane Doe #2 felt compelled to go with Joshua Dumas to Virginia because she had no money and had nowhere else to go, and Joshua Dumas told her that she was his “bitch,” and “under the rules of the game,” she could not leave;
- j. Barcus provided the money for the Greyhound bus tickets for Joshua Dumas, and Jane Does #1 and #2 to travel from Georgia to Virginia;
- k. Jane Doe #2 believes that she arrived, via a Greyhound bus, in Richmond, Virginia on December 8 or 9, 2012;
- l. in Virginia, Barcus and QUINTAVIS DUMAS picked the trio up and drove them to the Hyatt House hotel in Herndon, Virginia;
- m. once inside the hotel room, she observed Jane Does #3, #4,

and #5;⁸

- n. Barcus and Joshua Dumas both posted advertisements on Backpage.com, and in one of the advertisements, Jane Doe #2 was given the name "Candy;"
- o. during the time she was at the Hyatt House hotel, Jane Doe #2 engaged in sex acts in exchange for money with approximately four customers, including one prostitution engagement in which she and Jane Doe #1 performed sexual activities together with a male customer;
- p. customers were charged approximately \$150 for one-half hour of sex, \$200 to \$250 for one hour of sex, and \$200 to \$400 to engage in sexual activity with two girls;
- q. Jane Doe #2 gave all the money earned from the sexual activity to Joshua Dumas, who in turn gave the money to Barcus;
- r. Barcus, Joshua Dumas, and other conspirators usually stayed in the same hotel suite with Jane Does #1 through #5; however, Joshua Dumas and Barcus waited outside the suite, but nearby, when customers were scheduled to have sex with the girls;
- s. Barcus, Joshua Dumas, QUINTAVIS DUMAS and other coconspirators provided Jane Doe #2 with condoms, including Durex and Trojan brand condoms; and
- t. Barcus, Joshua Dumas, QUINTAVIS DUMAS, and other conspirators provided Jane Doe #2 with alcoholic beverages to drink, including Ciroc and Grey Goose brand vodka, and narcotics, including marijuana and "molly."⁹

⁸ Investigators showed Jane Doe #2 photographs of Jane Does #1, #3, #4, and #5, and Jane Doe #2 identified each of these individuals. Jane Doe #2 also identified the Backpage.com advertisement to which the undercover detective responded as an advertisement posted by Joshua Dumas.

⁹ I know from my training and experience that "Molly" is the street name for MDMA (3, 4-Methylenedioxymethamphetamine) in crystalline or powder form. In pill form, MDMA is commonly known as "ecstasy." I also know from my training and experience that pimps commonly provide drugs and alcohol to the women and girls they prostitute to keep them compliant and numb.

22. Jane Doe #2 stated that Jane Does #1, #3, #4, and #5 had also engaged in prostitution.

E. Brief Interview of Defendant Edwin Barcus, Jr. on December 20, 2012

23. On or about December 11, 2012, as the arrest team entered Room 214 at the Hyatt House hotel, someone fled from the police by jumping out of a window.

24. Jane Doe #1 and #2 later confirmed that “Boo,” whom they identified as Barcus, was the individual who fled from police.

25. On or about December 15, 2012, a Hyatt House hotel employee informed a Fairfax County detective that a male, who identified himself as “Ed,” telephoned the Hyatt House hotel, stated that he had been staying in Room 214, and that some of his property was still in the room. In particular, “Ed,” mentioned a “breathing machine” and a “Breitling for Bentley” watch. The Hyatt House employee informed “Ed,” that the Fairfax County Police were interested in the items but agreed to keep “Ed’s” telephone number.

26. On or about December 18, 2012, Fairfax County Police executed a search and seizure warrant, issued by a Fairfax County magistrate, at the Hyatt House hotel for the abandoned property left in Room 214, and seized a “breathing machine” and a “Breitling for Bentley” watch.

27. A Fairfax County detective, posing as a patrol officer, called “Ed” using the telephone number provided by the Hyatt House hotel. The detective had several conversations with “Ed.” “Ed” denied any involvement with the activities in the hotel room, but stated that he wanted to retrieve his property, including a watch that “Ed” described as a “\$10,000 watch with diamonds” and his “breathing machine.” “Ed” also offered to provide the police with information about drug dealing if the officer would arrange for Jane Doe #3’s release from

custody.¹⁰

28. On or about December 20, 2012, "Ed" agreed to meet with the detective (posing as a patrol officer) at a McDonald's restaurant to retrieve his property. When the officers arrived at the McDonald's restaurant, "Ed" was already in the parking lot and a detective positively identified "Ed" as Barcus.

29. In the parking lot, Barcus agreed to speak with the Fairfax County police officers. Among other things, Barcus stated that he knew Dumas had transported Jane Does #1 and #2 from Georgia to Virginia for prostitution. He further admitted that Jane Does #1 and #2 engaged in sex acts in exchange for money in the hotel room. However, Barcus denied any direct involvement in the prostitution of Jane Does #1 and #2. Rather, Barcus stated that he was with Jane Doe #3, and that while Jane Doe #3 had previously engaged in prostitution, she had not done so in Virginia. Barcus also admitted that he knew that Jane Doe #3 was 17 years old.

30. After Barcus made these statements, the Fairfax County Police arrested Barcus and charged him with: (1) Prostitution: Causing a Person to Enter a Bawdy Place, in violation of Section 18.2-355 of the Code of Virginia; (2) Keeping, Residing in, or Frequenting a Bawdy Place, in violation of Section 18.2-347 of the Code of Virginia; and (3) Contributing to the Delinquency of a Minor, in violation of Section 18.2-371 of the Code of Virginia.

31. On or about January 23, 2013, Barcus was arrested on a Criminal Complaint charging him with Sex Trafficking of a Minor, in violation of Title 18, United States Code, Section 1591. *See United States v. Edwin Barcus, Jr.*, No. 1:13-MJ-29-IDD. On or about

¹⁰ Jane Doe #2 was charged with prostitution, in violation of Section 18.2-346 of the Code of Virginia. This charge was later dismissed by the Office of the Commonwealth's Attorney for Fairfax County, Virginia.

March 11, 2013, Barcus pleaded guilty to Engaging in a Child Exploitation Enterprise, in violation of Title 18, United States Code, Sections 1591(a) and 2252A(g). *See United States v. Edwin Barcus, Jr.*, No. 1:13-CR-95-GBL.

F. Interview of Jane Doe #7 on January 11, 2013

32. On or about January 11, 2013, law enforcement officers interviewed an adult female, hereafter referred to as Jane Doe #7, at her residence in Georgia.

33. During the interview, among other things, Jane Doe #7 stated:

- a. she is 19 years old and originally from Georgia;
- b. sometime around May 2012, Jane Doe #1 introduced her to Barcus;
- c. she was taken to the Guest House hotel in Savannah, Georgia, where Barcus, Joshua Dumas, QUINTAVIS DUMAS, Koya Rooke,¹¹ and Jane Doe #6 were present; Jane Doe #7 did not engage in commercial sex acts at this time, but rather, “partied” with the others; Jane Doe #7 spent time with the group on a few more occasions;
- d. Barcus took Jane Does #7 and #1 to a strip club in Ridgeland, South Carolina; Jane Doe #7 danced at the strip club and was allowed to keep the money that she made from dancing;
- e. Barcus, Joshua Dumas, QUINTAVIS DUMAS, and Jane Doe #6 took Jane Doe #7 to Atlanta, Georgia; in Atlanta, Georgia, Barcus took Jane Doe #7 to a strip club and purchased clothes for her to wear while dancing; Barcus knew the manager of the strip club and arranged for Jane Does #1, #6, #7, and another adult female to dance nude for money; they danced at the strip club on two occasions and then returned to the Savannah, Georgia area;
- f. she knew Barcus, Joshua Dumas, and QUINTAVIS DUMAS were pimps as of May 2012;

¹¹ Jane Doe #7 identified Rooke as QUINTAVIS DUMAS’s girlfriend.

- g. in June 2012, Barcus told Jane Doe #7 that his “other girls” had left him and that he needed her to work for him; Jane Doe #7 needed money to help take care of her child; Jane Doe #7 had previously engaged in prostitution; when she was 15 years old, she was “turned out”¹² by another unidentified male whom she referred to as a “gorilla pimp,”¹³
- h. Jane Doe #7 first engaged in commercial sex acts at Barcus’s direction at a Sheraton hotel in Charleston, South Carolina in or around June 2012; Barcus “posted”¹⁴ an advertisement for Jane Doe #7 on the Internet website Backpage.com; Barcus also taught Jane Does #1 and #7 how to post advertisements on Backpage.com;
- i. Jane Does #1 and #6, Rooke, Barcus, Joshua Dumas, and QUINTAVIS DUMAS were also present in Charleston, South Carolina; they remained at the Sheraton for approximately two and one-half weeks;
- j. she had sex with multiple clients for money in Charleston, South Carolina; Barcus instructed the girls how much money to charge clients for sex acts; the prices were approximately \$80 for a “quickie,” \$120 for one half-hour, and \$160 for one hour;¹⁵ Barcus collected money earned from the commercial sex acts from all the girls except one adult female; Barcus controlled all of the money; at his direction, he provided the girls with money to purchase food, clothing, condoms, and other necessities;
- k. in and around July 2012, Barcus, Joshua Dumas, and QUINTAVIS DUMAS took Jane Does #1, #6, and #7, and three adult females to the Baymont Inn and Suites hotel in

¹² “Turned out” refers to the first time an individual has sex in exchange for money at the pimp’s direction.

¹³ “Gorilla pimp” refers to a pimp who uses physical violence to control the girls and women he is prostituting. These girls and women often endure harsh physical punishments to ensure that they follow the pimp’s rules.

¹⁴ “Posting” refers to creating an advertisement promoting prostitution on the Internet. Advertisements are most commonly posted on Backpage.com.

¹⁵ “Quickie” refers to a sex act where the client engages in vaginal sex with the girl or woman only long enough to ejaculate. “Half” refers to 30 minutes with the girl or woman and “Full” refers 60 minutes. These terms often include forms of foreplay, including massages and nude dancing, prior to vaginal intercourse.

Macon, Georgia; Jane Doe #7 and the other girls engaged in vaginal sex in exchange for money;

- l. during this time period, Barcus learned that Jane Doe #7 hid some of the money she earned from sex acts and sent the money back to Jane Doe #7's mother, who was caring for Jane Doe #7's infant child; Barcus assaulted Jane Doe #7 by striking her in the face with a closed fist several times, breaking Jane Doe #7's nose; Barcus did not allow Jane Doe #7 to go to the hospital or see a doctor;
- m. after leaving Macon, Georgia, Barcus and his associates transported the females to the Hampton Inn and Suites in Augusta, Georgia to engage in commercial sex acts;
- n. Barcus was the "boss man;" he was responsible for making all of the decisions and he held all the money; Barcus controlled all of the postings on Backpage.com or delegated that task; Barcus's approval was needed to purchase an item for girls or to provide money to any of the conspirators; Barcus also made all of the decisions regarding travel and who would arrange that travel;
- o. Joshua Dumas was responsible for obtaining and holding narcotics, including marijuana, ecstasy, and "molly;" Joshua Dumas was also responsible for recruiting new girls, and controlling some of the girls (Jane Doe #1, and later, Jane Doe #2);
- p. QUINTAVIS DUMAS was responsible for holding the firearm used by the enterprise; the firearm was a black semi-automatic handgun; Jane Doe #7 once passed the firearm from an adult female to her male associate;
- q. from Augusta, Georgia, QUINTAVIS DUMAS and Rooke transported the females to the La Quinta hotel in Tallahassee, Florida to engage in commercial sex acts;
- r. from Tallahassee, Florida, QUINTAVIS DUMAS and Rooke transported the females to Atlanta, Georgia for the purposes of commercial sex; in Atlanta, Georgia the enterprise brought in Jane Doe #3;
- s. from Atlanta, Georgia, Quintavis Dumas and ROOKE transported the females to Murfreesboro, Tennessee;

following their stay in Murfreesboro, Tennessee, Jane Doe #7 escaped from the enterprise;

- t. members of the criminal enterprise, including QUINTAVIS DUMAS, used the prostitution proceeds to purchase clothing, Magnum, Trojan, and Durex brand condoms, and Ciroc and Grey Goose brand alcohol;
- u. Barcus required his females to get tattoos of his name; Jane Doe# 7 has a tattoo of a five-pointed star with a cherry and the name "Boo" on her abdomen;
- v. the members of the criminal enterprise knew the ages of the girls being prostituted; they knew Jane Doe #1's age because they were together when Jane Doe #1 celebrated her 17th birthday; they knew Jane Doe #2's age because Jane Doe #2 told them her age; they knew Jane Doe #6's age because they had specific conversations regarding her age; and
- w. members of the criminal enterprise told her about their affiliation with the Bloods criminal street gang.

G. Interview of QUINTAVIS DUMAS

34. On March 3, 2013, law enforcement officers interviewed QUINTAVIS DUMAS at his home in Snellville, Georgia. QUINTAVIS DUMAS, who was not in custody and was not arrested after the interview, was advised of the identity of the investigators and that he did not have to speak with them if he did not wish to do so. He agreed to speak with the investigators and, among other things, said the following:

- a. his first involvement with prostitution was when he assisted Barcus in obtaining an apartment in Atlanta, Georgia to house girls and women being prostituted; two females, Jane Doe #8 and Rooke, engaged in commercial sex acts at this apartment; he financially benefited from these acts;
- b. he traveled to Savannah, Georgia for prostitution in or around the summer of 2012; while in Savannah, Georgia, he met Jane Does #1 and #6, who subsequently traveled with him and others to various locations;

- c. after taking a trip to Myrtle Beach, South Carolina during Bike Week, Jane Does #1 and #6 engaged in commercial sex acts in Savannah, Georgia;
- d. he and Rooke rented hotel rooms at various hotels which were used for underage girls to perform commercial sex acts;
- e. while in Savannah, Georgia he learned that Jane Doe #1 was under the age of 18 years; law enforcement officers took Jane Doe #1 into custody because she was a missing juvenile, and those officers told him, Rooke, and other members of the enterprise that Jane Doe #1 was 16 years old; the officers returned Jane Doe #1 to her legal guardian;
- f. following this incident, Jane Doe #1 rejoined the enterprise and again engaged in prostitution;
- g. the enterprise prostituted three juveniles (Jane Does #1, # 6, and #8) in Savannah, Georgia;
- h. he, Barcus, Joshua Dumas, and Rooke, knew the ages of the girls they prostituted; he had separate conversations with Barcus and Rooke about the girls being under the age of 18 years;
- i. from Savannah, Georgia, the enterprise moved to Atlanta, Georgia for the purposes of prostitution; he and Rooke rented a vehicle which was used to transport members of the enterprise and the underage girls who were being prostituted, from Savannah to Atlanta;
- j. the females engaged in prostitution in Atlanta, Georgia, and he then drove them back to Savannah, Georgia where they engaged in additional commercial sex acts;
- k. he and Rooke often rented the vehicles to transport members of the enterprise; he recalled transporting members from Georgia to Florida, Tennessee, South Carolina, and Virginia;
- l. he and Rooke rented hotel rooms at the various locations; these hotel rooms were paid for with money earned from prostitution and were used by the women and girls who

were being prostituted to perform commercial sex acts; he rented hotel rooms for commercial sex acts in Georgia, Florida, Tennessee, South Carolina, and Virginia;

- m. the enterprise recruited another juvenile female, Jane Doe #3, who suggested they go to Herndon, Virginia because “the money was good there;”
- n. Barcus decided that they would travel to Virginia; QUINTAVIS DUMAS and Rooke drove Barcus and Jane Doe #3 from Georgia to Herndon, Virginia for the purposes of prostitution;
- o. Barcus arranged to transport Jane Doe #4 from Indiana to Maryland to engage in commercial sex acts in Herndon, Virginia; then Barcus and Jane Doe #3, using the vehicle QUINTAVIS DUMAS rented, picked up Jane Doe #4 in Maryland and transported her back to Virginia for the purposes of prostitution;
- p. Barcus paid for Dumas and Jane Does #1 and #2 to travel from Atlanta, Georgia to Richmond, Virginia on a Greyhound bus;
- q. QUINTAVIS DUMAS, accompanied by Barcus, drove from Herndon, Virginia to Richmond, Virginia to pick up Joshua Dumas and Jane Does #1 and #2; QUINTAVIS DUMAS then drove them back to Herndon, Virginia so that Jane Does #1 and #2 could engage in prostitution;
- r. the money earned by the enterprise from commercial sex acts was used to purchase food, clothing, hotel rooms, and rental cars for use by the enterprise;
- s. he provided marijuana to members of the enterprise;
- t. his role in the enterprise was that of an “advisor” to Barcus; he and Barcus discussed issues with the girls and women being prostituted, how to manage them, and different locations, among other decisions;
- u. if there was a problem with a client, he would be summoned as a show of force;
- v. he carried a firearm to protect the enterprise; the first

firearm he carried in Georgia was a revolver; he later purchased a Glock 9mm semi-automatic pistol prior to coming to Virginia; he purchased the Glock from an individual on the street in Atlanta, Georgia; the seller is incarcerated for allegedly attempting to murder a police officer by shooting at the officer; and

- w. when asked why he carried a firearm, QUINTAVIS DUMAS responded “prostitution is a dangerous business, I have to protect myself.”


IV. CONCLUSION

35. Based on the facts set forth above, I respectfully submit that there is probable cause to believe that, between in and around June 2012 and on or about December 11, 2012, in Fairfax County and elsewhere, in the Eastern District of Virginia and elsewhere, the defendant QUINTAVIS DEONTE DUMAS, also known as “Tay,” aided and abetted by others, did knowingly recruit, entice, harbor, transport, provide, and obtain a girl, Jane Doe #1, who had not attained the age of 18 years, in and affecting interstate commerce, knowing and in reckless disregard of the fact that this girl, Jane Doe #1, had not yet attained the age of 18 years, and the defendant knowingly caused Jane Doe #1 to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and 2.

36. In addition, I believe that there is probable cause to charge QUINTAVIS DUMAS with the following crimes:

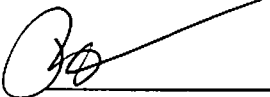
- a. Conspiracy to Commit Sex Trafficking of Children, in violation of Title 18, United States Code, Section 1594(c);
- b. Sex Trafficking of a Child with respect to Jane Doe #2, in violation of Title 18, United States Code, Sections 1591(a) and 2;
- c. Sex Trafficking of a Child with respect to Jane Doe #3, in violation of Title 18, United States Code, Sections 1591(a) and 2;

- d. Sex Trafficking of a Child with respect to Jane Doe #4, in violation of Title 18, United States Code, Sections 1591(a) and 2;
- e. Conspiracy to Transport a Minor Interstate to Engage in Prostitution, in violation of Title 18, United States Code, Sections 371 and 2423(a);
- f. Transportation of a Minor Interstate to Engage in Prostitution with respect to Jane Doe #1, in violation of Title 18, United States Code, Section 2423(a);
- g. Transportation of a Minor Interstate to Engage in Prostitution with respect to Jane Doe #2, in violation of Title 18, United States Code, Section 2423(a);
- h. Transportation of a Minor Interstate to Engage in Prostitution with respect to Jane Doe #3, in violation of Title 18, United States Code, Section 2423(a);
- i. Transportation of a Minor Interstate to Engage in Prostitution with respect to Jane Doe #4, in violation of Title 18, United States Code, Section 2423(a); and
- j. Persuading an Individual to Travel Interstate for Purposes of Prostitution with respect to Jane Doe #5, in violation of Title 18, United States Code, Section 2422.



Jeffrey F. Johannes
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me on this
23rd day of April, 2013 in Alexandria, Virginia.



Theresa Carroll Buchanan
United States Magistrate Judge

The Honorable Theresa C. Buchanan
United States Magistrate Judge